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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE: TOTSY DWAIN SPENCE
JANA KAYLE SPENCE
Debtors,

U.S. BANK NATIONAL ASSOCIATION
Its Successors and Assigns
Movant

v.

TOTSY AND JANA SPENCE
and CAREY EBERT, Trustee
Respondents

CASE NO. 16-40602-BTR-13

CHAPTER 13

NO HEARING DATE

ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Totsy and Jana Spence (hereinafter "Debtor") with this their Answer to Motion for Relief from Automatic Stay filed by U.S. Bank National Association ("Movant"), and in support thereof would respectfully show the Court as follows:

1. Debtor admits the allegations contained in paragraph 1 of Movant's Motion for Relief from Automatic Stay (the "Motion").
 2. Debtor admits the allegations contained in paragraph 2 of the Motion.
 3. Debtor admits the allegations contained in paragraph 3 of the Motion.
 4. Debtor has insufficient knowledge or information to either admit or deny the allegations contained in paragraph 4 of the Motion.
 5. Debtor has insufficient knowledge or information to either admit or deny the allegations contained in paragraphs 5 and 6 of the Motion.

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6. Debtor admits the allegations contained in paragraph 7 of the Motion.
7. Debtor denies the allegations contained in paragraphs 8, 9, 10, 11, 12, 13, 14 and 15 and of the Motion.

8. Anything not specifically admitted herein is hereby denied.

WHEREFORE, PREMISES CONSIDERED, The Debtor respectfully requests that the Court deny the relief requested in the Motion and allow the automatic stay to continue pursuant to Section 362 of the Bankruptcy Code.

DATED this 8th day of August, 2018

Respectfully submitted,

RUBIN & ASSOCIATES, P.C.
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Dallas, Texas 75240
(214) 742-6900

By:/s/ Mark S. Rubin
Mark S. Rubin - Bar No. 17361550
Kelli L. Johnson - Bar No. 24053317

ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of August, 2018, a true and correct copy of the foregoing was served via first class United States mail, postage prepaid to the following:

Carey Ebert
P.O. Box 941166
Plano, Texas 75094

William T. Neary, U.S. Trustee
110 North College Street
Tyler, Texas 75702

Christina Camarata
Codillis & Stawiarski, PC
400 N. Sam Houston Parkway East, Suite 900A
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/s/ Mark S. Rubin
One of Counsel